

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION (DETROIT)

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846-swr

Hon. Steven W. Rhodes

**THE RETIREE ASSOCIATION PARTIES' CONSOLIDATED
WITNESS LIST IN CONDITIONAL SUPPORT OF THE PLAN**

The Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively “Retiree Association Parties”) through their counsel, Lippitt O’Keefe Gornbein, PLLC and Silverman & Morris, P.L.L.C., submit the following Consolidated Witness List, pursuant to paragraph 3(c) of the First Amended Stipulation Modifying Certain Plan Discovery and pleading Deadlines for Certain Non-Debtor Parties (dkt. no. 5482).

The Retiree Association Parties will call the following witnesses in support of the Plan at the confirmation hearing:

1. Shirley V. Lightsey (see Declaration, Dkt. 502)
c/o Lippitt O’Keefe Gornbein, PLLC
370 E. Maple Road
Third Floor
Birmingham MI, 48009
(248) 646-8292

Ms. Lightsey is prepared to testify on matters including, but not limited to, her belief about the constitutional guarantee of municipal pensions under Art. IX § 24 of the Michigan Constitution; personal impact of the Plan on pension and other post-employment benefits; personal reliance on pension guarantee and other post-employment benefit promises; historic background of pension and other post-employment benefits; and the agreement reached by the DRCEA and the City.

2. Donald Taylor (see Declaration, Dkt. 502)
c/o Lippitt O'Keefe Gornbein, PLLC
370 E. Maple Road
Third Floor
Birmingham MI, 48009
(248) 646-8292

Mr. Taylor is prepared to testify on matters including, but not limited to, his belief about the constitutional guarantee of municipal pensions under Art. IX § 24 of the Michigan Constitution; personal impact of the Plan on pension and other post-employment benefits; personal reliance on pension guarantee and other post-employment benefit promises; historic background of pension and other post-employment benefits; and the agreement reached by the RDPFFA and the City.

3. Any and all witnesses listed, regardless of whether they are called, on the witness list of any party.

4. Any and all witnesses necessary to provide a proper foundation for any physical and/or documentary evidence or to rebut the same regarding testimony or other evidence sought to be admitted by any party.

[Signature(s) appear on the following page]

Respectfully submitted,

By: /s/ Karin F. Avery

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Dated: June 30, 2014